

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ADVANCEME, INC.,

Plaintiff,

v.

AMERIMERCHANT, LLC,

Defendant.

§
§
§
§
§
§
§
§
§
§

CASE NO. 6:06-CV-082 (LED – JDL)

JURY TRIAL DEMANDED

**CONSENT MOTION FOR AN EXTENSION OF TIME TO
FILE REPLY BRIEFS FOR DOCKET ENTRY 132**

Plaintiff AdvanceMe, Inc. (“AdvanceMe”) and Defendant AmeriMerchant LLC (“AmeriMerchant”) respectfully submit their consent motion for an extension of time to file the reply brief for docket entry 132. AdvanceMe respectfully requests an extension of time until Monday, June 18, 2007 to file its Reply regarding Docket Entry 132.

AdvanceMe and AmeriMerchant represent that the proposed extension is not sought for purposes of delay, but that justice might be done. Counsel for AdvanceMe and AmeriMerchant met and conferred on June 11, 12, and 13, 2007 regarding the instant motion, and AdvanceMe and AmeriMerchant consented to its submission.

Date: June 14, 2007

Respectfully submitted,

By: /s/ Robert C. Matz

PAUL, HASTINGS, JANOFSKY & WALKER LLP

Ronald S. Lemieux (ronlemieux@paulhastings.com)

(CA Bar No. 120822) (Admitted Pro Hac Vice)

Michael N. Edelman (michaeeleman@paulhastings.com)

(CA Bar No. 180948) (Admitted Pro Hac vice)

Vidya R. Bhakar (vidbhakar@paulhastings.com)

CONSENT MOTION FOR AN EXTENSION
OF TIME TO FILE REPLY BRIEF
FOR DOCKET ENTRY 132

CASE NO. 6:06-CV-082 (LED-JDL)

(CA Bar No. 220210) (Admitted Pro Hac Vice)
Robert C. Matz (robertmatz@paulhastings.com)
(CA Bar No. 217822) (Admitted Pro Hac Vice)
Shanee Y. Williams (shaneewilliams@paulhastings.com)
(CA Bar No. 221310) (Admitted Pro Hac Vice)
Five Palo Alto Square, Sixth Floor
Palo Alto, CA 94306-2155
Telephone: 650.320.1800
Facsimile: 650.320.1900

IRELAND CARROLL & KELLEY

Otis W. Carroll, Jr. (fedserve@icklawn.com)
LEAD ATTORNEY
State Bar No. 03895700
Deborah J. Race (drace@icklawn.com)
State Bar No. 16448700
6101 S. Broadway, Suite 500
Tyler, TX 75730
Telephone: 903.561.1600
Facsimile: 903.581.1071

ATTORNEYS FOR PLAINTIFF ADVANCEME, INC.

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served a copy of this document via the court's CM/ECF system pursuant to Local Rule cv-5(a)(3) on this the 13th day of June, 2007. Any other counsel of record will be served by first class mail on this same date.

/s/ Robert C. Matz
Robert C. Matz

CERTIFICATE OF CONFERENCE

I hereby certify that counsel of record for AdvanceMe and Defendant AmeriMerchant LLC met and conferred on June 11, 12, and 13, 2007 regarding this motion and have consented to its submission.

/s/ Robert C. Matz
Robert C. Matz

LEGAL_US_W # 56467588.1